

The Scheme to Defraud

2. From in or around August 2018 through in or around June 2019, in Somerset County, in the District of New Jersey, and elsewhere, the defendant,

KATERZYNA ZALEWSKI,

did knowingly and intentionally execute and attempt to execute a scheme and artifice to defraud a financial institution, as defined in Title 18, United States Code, Section 20, namely “Victim Bank 1,” whose deposits were insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody or control of “Victim Bank 1,” by means of false and fraudulent pretenses, representations, and promises, as more fully set forth below.

Goal of the Scheme to Defraud

3. The goal of the scheme to defraud was for ZALEWSKI to steal funds from “Victim Bank 1” and “Victim Customer A” by making unauthorized transfers from “Victim Customer A’s” bank accounts.

Manner and Means of the Scheme to Defraud

4. It was part of the scheme to defraud that:

a. From in or around August 2018 through in or around June 2019, ZALEWSKI used her position as a bank teller

to make unauthorized transfers from "Victim Customers A's" Certificate of Deposit accounts (CD) to "Victim Customers A's" checking account with the intent to fraudulently withdraw funds.

b. From in or around August 2018 through in or around June 2019, ZALEWSKI used "Victim Customer A's" checking accounts to issue unauthorized fraudulent cashier's checks payable to ZALEWSKI's relatives and others; and

c. ZALEWSKI fraudulently caused "Victim Bank 1" to release the following approximate sums of money from "Victim Customer A's" accounts:

Date	Total Amount Including Interests and Fees
August 2, 2018	\$34,636.65
August 2, 2018	\$101,777.09
January 8, 2019	\$47,925.79
January 8, 2019	\$54,403.80
April 17, 2019	\$32,146.14
April 26, 2019	\$13,053.00
May 21, 2019	\$15,441.82
May 30, 2019	\$18,440.97
June 4, 2019	\$15,229.71
June 10, 2019	\$5,809.45
June 13, 2019	\$1,752.56
June 13, 2019	\$19,238.12
Total sum	\$359,855.10

In violation of Title 18, United States Code, Section 1344.

FORFEITURE ALLEGATION

As a result of committing the offense charged in this Information, the defendant,

KATERZYNA ZALEWSKI,

shall forfeit to the United States of America, pursuant to 18 U.S.C. § 982(a)(2), any and all property constituting or derived from any proceeds obtained directly or indirectly as a result of the offense.

Substitute Assets Provision

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 982(b)(1) and 28 U.S.C. § 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.


CRAIG CARPENITO
United States Attorney

CASE NUMBER: ~~20~~-47 (PGS)

United States District Court
District of New Jersey

UNITED STATES OF AMERICA

v.

KATERZYNA ZALEWSKI

INFORMATION FOR

18 U.S.C. § 1344

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